

EXHIBIT A

BRENT BRAMNICK, ESQ.
ID # 027412008
BRAMNICK, RODRIGUEZ,
GRABAS ARNOLD & MANGAN, LLC
1827 East Second Street
Scotch Plains, NJ 07076
Telephone: (908) 322-7000
Facsimile: (908) 322-6997
Attorney for Plaintiff

KEICHA BYRD,

Plaintiff(s),

v.

KYLE L. RAIKES, and THE FELIX GROUP d/b/a
KWJW DISTRIBUTORS, LLC , JOHN DOES 1-
10 (said names being fictitious) and XYZ
CORPORATIONS 1-10 (said names being
fictitious),

Defendant(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
DOCKET NO.:

Civil Action

**COMPLAINT, JURY DEMAND,
DEMAND FOR PRODUCTION OF
DOCUMENTS AND DEMAND FOR
ANSWERS TO INTERROGATORIES**

Plaintiff, KEICHA BYRD, residing at 1037 W 5th Street, in the City of Plainfield,
County of Union, and State of New Jersey, by way of Complaint against defendants,
KYLE L. RAIKES, and THE FELIX GROUP d/b/a KWJW DISTRIBUTORS, LLC,
JOHN DOES 1-10 (said names being fictitious) and XYZ CORPORATIONS 1-10 (said
names being fictitious), says:

FIRST COUNT

1. On or about February 17, 2021, plaintiff, KEICHA BYRD, was the
operator and owner of a motor vehicle stopped, northbound, on Durham Avenue at or

near the intersection of I 287 South, in the City of South Plainfield, County of Middlesex, and State of New Jersey.

2. At the above-mentioned time and place defendant, KYLE L. RAIKES was the operator of a motor vehicle owned by defendant, THE FELIX GROUP d/b/a KWJW DISTRIBUTORS, LLC traveling westbound on I 287, making a left hand turn on to Durham Avenue at or near the intersection of I 287, in the City of South Plainfield, County of Middlesex, and State of New Jersey.

3. At the above-mentioned time and place, defendants did so negligently own, operate, maintain and/or control their motor vehicle so as to cause their motor vehicle to collide with plaintiff's motor vehicle.

4. As a direct and proximate result of the negligence of the defendants as aforesaid, plaintiff has suffered and will in the future suffer much pain in mind and body, has incurred and will in the future incur expenses for medical care and treatment, has suffered and will in the future suffer economic loss, was unable and will in the future be unable to attend to her usual and customary activities and was caused to suffer permanent injury.

5. Plaintiff has obtained the requisite certification from her treating physician pursuant to Title 39. A copy of same is attached hereto as **Exhibit A**.

WHEREFORE, plaintiff, KEICHA BYRD, demands judgment against defendants, KYLE L. RAINKES, THE FELIX GROUP d/b/a KWJW DISTRIBUTORS for damages together with interest, counsel fees and costs of suit.

SECOND COUNT

1. Plaintiffs repeat and reiterate the allegations contained in the First Count of the Complaint as if set forth more fully at length herein.

2. Defendants, JOHN DOES 1-10 (said names being fictitious) and XYZ CORPORATIONS 1-10 (said names being fictitious), negligently own, operate, maintain and/or control their motor vehicle so as aforesaid.

3. As a direct and proximate result of the negligence of the defendants as aforesaid, plaintiff has suffered and will in the future suffer much pain in mind and body, has incurred and will in the future incur expenses for medical care and treatment, has suffered and will in the future suffer economic loss, was unable and will in the future be unable to attend to her usual and customary activities and was caused to suffer permanent injury.

4. Plaintiffs reserve the right to amend the Complaint to join these potentially culpable parties if discovery should reveal that said parties are in any way responsible for the injuries sustained by plaintiff.

WHEREFORE, plaintiff, KEICHA BYRD, demand judgment against the defendants, KYLE L. RAINKES, THE FELIX GROUP d/b/a KWKJ DISTRIBUTORS, JOHN DOES 1-10 (said names being fictitious) and/or XYZ CORPORATIONS 1-10 (said names being fictitious) for damages together with interest, counsel fees and costs of suit.

DESIGNATION OF TRIAL COUNSEL

Brent Bramnick is hereby designated as trial counsel pursuant to Court Rule 4:5-1.

JURY DEMAND

Plaintiff herein demands trial by jury as to all issues so triable.

Dated:

8/16/21

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorney for Plaintiff

BY:


BRENT BRAMNICK, ESQ.

DEMAND FOR INSURANCE INFORMATION

Plaintiff hereby demands that defendants set forth the name of any insurance carrier providing coverage for plaintiff's injuries, the policy number and the extent of liability limits.

Dated:

8/16/21

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorney for Plaintiff

BY:


BRENT BRAMNICK, ESQ.

DEMAND FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 4:18-1, plaintiff hereby demands that the defendants produce the following documentation within thirty (30) days as prescribed by the Rule of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendants are therefore required to continuously update their responses thereto as new information or documentation comes into evidence.

1. The amounts of any and all insurance coverage covering the defendants including but not limited to primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each policy of insurance, supply a copy of the declaration page therefrom.

2. Copies of any and all documentation or reports, including but not limited to police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplications of any an all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise

recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, business, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to any contracts between the owner of the property or product involved in the incident in question and any of the parties involved in this matter.

6. Copies of any and all documentation, including but not limited safety manuals, statutes, rules, regulations, books, and/or industry standards which refer to, reflect or otherwise related to the incident in question or any potential defense to the action in question.

7. Copies of any and all discovery received from any other parties to the action in question.

8. Copies of any and all reports on the plaintiff received by the defendants, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

9. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

10. Copies of any and all records of any type subpoenaed by the defendants or received from any other source concerning the plaintiff or the incident in question.

11. Any and all videotapes or moving pictures made of plaintiff and/or the subject matter of this accident.

12. Please be advised that the plaintiff hereby objects to the taking of any photographs, x-rays or other reproductions concerning the plaintiff or the plaintiff's injuries at the time of defense examination.

DEMAND FOR ANSWERS TO INTERROGATORIES

Plaintiff hereby demands that defendants answer Form C and C (1) Interrogatories within the time prescribed by the Court Rules.

CERTIFICATION

Pursuant to R. 4:15-1, I hereby certify that the matter in controversy is not the subject of any other pending or contemplated action or arbitration proceeding. This party is not aware of any other parties who should be joined in this action at this time.

Dated: 8/16/21

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN LLC
Attorney for Plaintiff

BY:

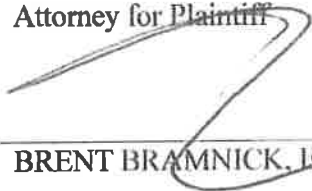

BRENT BRAMNICK, ESQ.

EXHIBIT A

**CERTIFICATION PURSUANT TO N.J.S.A. 39:6A-8a OF THE
AUTOMOBILE INSURANCE COST REDUCTION ACT OF 1998**

1. I am a licensed physician as defined by N.J.S.A. 45:9-5.1.
2. I am a treating physician to the plaintiff, Keicha Byrd, for injuries sustained on February 17, 2021.
3. All of the opinions set forth herein are within a reasonable degree of medical probability.
4. As a result of the February 17, 2021 accident, Keicha Byrd sustained the following injuries:
 - Disc bulge at C3-C4
 - Disc herniation at C4-C5, C5-C6, C6-7
 - Disc herniation at L3-4, L4-5, L5-S1
5. This certification is based on objective clinical evidence including, but not limited to:
 - MRI of the C-spine
 - MRI of the L-spine
 - Physical examination
6. Any testing referred to above is not experimental in nature nor are the results of such tests dependent entirely on subjective patient response.
7. Based on my professional expertise and objective clinical evidence including my clinical findings and the results of objective medical tests, it is my opinion within a reasonable degree of medical probability that Keicha Byrd has sustained a permanent injury in that she has not healed to function normally and will not heal to function normally with further medical treatment.
8. I certify under penalty of perjury that the above conclusions are true to the best of my knowledge and belief. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

8/10/21


Dr. Wayne Fleischhacker

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-004864-21

Case Caption: BYRD KEICHA VS RAIKES KYLE

Case Initiation Date: 08/16/2021

Attorney Name: BRENT ALAN BRAMNICK

Firm Name: BRAMNICK RODRIGUEZ GRABAS ARNOLD &
MANGAN LLC

Address: 1827 E SECOND ST

SCOTCH PLAINS NJ 07076

Phone: 9083227000

Name of Party: PLAINTIFF : Byrd, Keicha

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Keicha Byrd? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

08/16/2021
Dated

/s/ BRENT ALAN BRAMNICK
Signed

EXHIBIT B

KEICHA BYRD
vs.
KYLE L. RAIKES, ET AL

Plaintiff
Defendant

Superior Court of New Jersey
Law Division
Middlesex County
Docket Number: MID-L-004864-21

Person to be served (Name & Address):
KYLE L. RAIKES
1754 HOMESTEAD STREET
BALTIMORE, MD 21218

Attorney:
Brent Bramnick, Esq.

AFFIDAVIT OF SERVICE

(For Use by Private Service)



STS2021024618

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Papers Served: Summons, Complaint, Demand for Production of Documents, Demand for Answers to Interrogatories, Demand For Insurance Information, Certification, Exhibit A, CIS, Track Assignment Notice and Lawyers Referral List

Service Data:

Served Successfully ☒ Not Served _____ Date: 9/3/2021 Time: 10:07 am Attempts: _____

_____ Delivered a copy to him / her personally

Name of Person Served and relationship / title:

_____ Left a copy with a competent household member over 14 years of age residing therein

MRS. (REFUSED FIRST NAME) RAIKES

☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

HOUSEHOLD MEMBER/ WIFE

Description of Person Accepting Service:

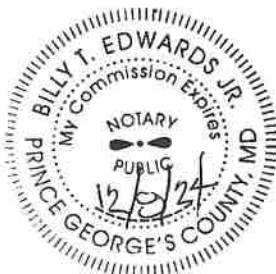
Sex: F Age: 38 Height: 5'8" Weight: 170 Skin Color: BLACK Hair Color: BLACK

Comments or Remarks:

Server Data:

Subscribed and Sworn to before me on Sept 8 2021
by the affiant who is personally known to me.

Brent Bramnick
NOTARY PUBLIC



I, ALLEN D ELLISON, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

Date

STATUS, L.L.C.
PO Box 370
Bayville, NJ 08721
(908) 688-1414
Our Job Serial Number: STS-2021024618

EXHIBIT C

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendant: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWWJ DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

**ANSWER, SEPARATE DEFENSES,
ANSWERS TO ALL CROSS-CLAIMS,
CROSS-CLAIMS, DEMAND FOR
DAMAGES, JURY DEMAND,
DESIGNATION OF TRIAL COUNSEL,
NOTICE PURSUANT TO RULES 1:5-1
AND 4:17-4(c), DEMAND FOR
INTERROGATORIES, DEMAND FOR
EXECUTED HIPAA MEDICAL
AUTHORIZATIONS,
CERTIFICATION, AND PROOF OF
ATTORNEY MAILING**

Defendant, Kyle L. Raikes, by his attorneys, TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP, as and for his Answer to plaintiff's Complaint, respectfully alleges:

FIRST COUNT

1. Denies knowledge and information sufficient to form a belief as to those allegations
set forth in the paragraphs number "1", "2" and "5".

2. Denies each and every allegation set forth in the paragraphs numbered "3" and "4".

SECOND COUNT

1. Defendant, Kyle L. Raikes, repeats and reiterates each and every denial heretofore made in this Answer to the paragraphs of the Complaint designated FIRST COUNT inclusive, with the same force and effect as if set forth here more particularly at length, in response to paragraph “1” of the Second Count.

2. Denies knowledge and information sufficient to form a belief as to those allegations set forth in the paragraphs number “2”, “3” and “4”.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

1. Plaintiff has recovered the costs of medical care, dental care, custodial care, rehabilitation services, loss of earnings and other economical loss, and any future such loss or expense will, with reasonable probability, be replaced or indemnified in whole or in part from collateral sources. Any award made to plaintiff shall be reduced in accordance with the provisions of *New Jersey Court Rule 2A:15-97*.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

2. The within action is barred or limited in accordance with the provisions of the Comparative Negligence Act and *N.J.S.A. 2A:15-5.1, et. seq.*

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

3. Any injury, damage or loss sustained was the result of the contributory negligence of plaintiff.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

4. The defendant was faced with an emergency situation and acted reasonably under the circumstances, and by reason thereof was guilty of no negligence with respect to the accident in question.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

5. The Complaint fails to allege facts or set forth a cause of action upon which relief can be granted.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

6. The Summons and Complaint of plaintiff is defective because of insufficiency of process and/or insufficiency of service of process.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

7. Any recovery in this action is limited by and in accordance with the New Jersey Joint Tortfeasors Contribution Law, N.J.S.A. 2A:53A.

AS AND FOR A EIGHTH AFFIRMATIVE DEFENSE

8. This Court does not have jurisdiction over the subject matter of this suit and the answering party reserves the right to move to dismiss due to lack of jurisdiction over the subject matter.

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

9. Defendant says that any damages suffered by plaintiff as a result of the circumstances pled in plaintiff's Complaint were the direct result of plaintiff's failure to take reasonable action to prevent damages, and by such failure, plaintiff failed to mitigate any damages in this action.

AS AND FOR A TENTH AFFIRMATIVE DEFENSE

10. Any injury, damage or loss sustained was the result of the negligence of third parties over whom this defendant had no control.

AS AND FOR A ELEVENTH AFFIRMATIVE DEFENSE

11. Plaintiff's injuries were caused in whole or in part by the failure of the host vehicle to properly restrain plaintiff in said motor vehicle with a safety seat or belt.

AS AND FOR A TWELFTH AFFIRMATIVE DEFENSE

12. Defendant was not guilty of any negligence.

AS AND FOR A THIRTEENTH AFFIRMATIVE DEFENSE

13. Defendant reserves the right to move at or before the trial of this matter to strike the Complaint on the grounds set forth in the Separate Defenses. Defendant hereby reserves the right to move at or before the trial of this matter to strike the Complaint on the grounds that it fails to set forth a cause of action.

AS AND FOR A FOURTEENTH AFFIRMATIVE DEFENSE

14. Any injury, damage or loss sustained was the result of the sole negligence of plaintiff.

AS AND FOR A FIFTEENTH AFFIRMATIVE DEFENSE

15. This action is time barred by the applicable Statute of Limitations.

AS AND FOR A SIXTEENTH AFFIRMATIVE DEFENSE

16. Any injury, damage or loss sustained was the result of an unavoidable accident.

AS AND FOR A SEVENTEENTH AFFIRMATIVE DEFENSE

17. Plaintiff's alleged injuries were not the result of any action and/or omission on the part of defendant, Kyle L. Raikes.

AS AND FOR AN EIGHTEENTH AFFIRMATIVE DEFENSE

18. Without admitting any negligence or breach of duty, defendant states that plaintiff's injuries or damages were the result of a superseding or intervening cause.

AS AND FOR A NINETEENTH AFFIRMATIVE DEFENSE

19. Plaintiff's alleged injuries do not breach the tort threshold and the Complaint should be dismissed. See N.J.S.A. 39:6A-8.

ANSWER TO ALL CROSS-CLAIMS

Defendant denies the allegations of any cross-claims which have been or may be asserted against him.

DEMAND FOR SPECIFICATION OF DAMAGES

Pursuant to *New Jersey Court Rule 4:5-2*, the defendant, Kyle L. Raikes, hereby demands of plaintiff, Keicha Byrd, a specific statement of the amount of money damages claimed on each count of the Complaint.

JURY DEMAND

Defendant, Kyle L. Raikes, hereby demands a trial by jury on all of the issues.

NOTICE OF DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that, pursuant to *New Jersey Court Rule 4:25-4*, notice is hereby given that Gregory S. Pennington and Lisa M. Rolle, are designated as trial counsel in the above matter.

NOTICE PURSUANT TO RULES 1:5-1 AND 4:17-4(c)

PLEASE TAKE NOTICE, that the undersigned attorney does hereby demand, pursuant to the above cited rules of Court, that each party herein deriving or receiving pleadings, deposition transcripts, discovery requests, interrogatories, correspondence, and other similar documents or responses thereto, is hereby requested to serve same upon the undersigned attorney, whether or not they were received or served prior to or after the filing date of this Answer.

DEMAND FOR CERTIFIED ANSWERS TO INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to *New Jersey Court Rule 4:17-1(b)*, defendant hereby demands that plaintiff serve answers to Form A Interrogatories, within the time proscribed by the Rules of Court.

DEMAND FOR EXECUTED HIPAA MEDICAL AUTHORIZATIONS

PLEASE TAKE NOTICE that pursuant to *New Jersey Court Rule 4:17-4(f)*, effective September 1, 2014, defendant hereby demands that plaintiff provide, contemporaneously with his answers to Interrogatories, fully completed and executed medical authorizations pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 42 U.S.C. § 1301, *et seq.*, as to each health care provider named in his answers to Interrogatories, excluding non-treating expert witnesses, in the format and text of the authorization attached hereto.

CERTIFICATION

The undersigned hereby certifies that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

The undersigned hereby certifies that the within pleading has been filed and served in accordance with *New Jersey Court Rule 4:6*.

I certify that the foregoing statements are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

WHEREFORE, defendant, Kyle L. Raikes, demands judgment dismissing the Complaint herein together with the costs and disbursements of this action.

Dated: October 8, 2021



TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP
Jessica L. Lentini, Esq.
Attorneys for Defendant: Kyle L. Raikes

AUTHORIZATION FOR RELEASE OF PROTECTED HEALTH INFORMATION MEDICAL RECORDS

This authorization is effective April 14, 2003, pursuant to the Department of Health and Human Services Standards for Privacy of Individually Identifiable Health Information, 45 C.F.R. Parts 160 and 164, promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), Title II, Subtitle F, §§ 261-264, Public Law 104-191.

TO: Provider Name:
 Provider Address:

RE: Patient Name:
 Patient Address:

 Patient Date of Birth:
 Patient Social Security No.:

 Date of Service:
 Lawsuit Case Name:
 Docket Number:

I, _____, am a plaintiff/patient and/or plaintiff/personal representative of the above named patient in the above-referenced civil action pending in Superior Court of New Jersey, Law Division, _____. I hereby execute this Authorization for the disclosure of health information for purposes of the above litigation.

1. I hereby authorize and direct that a true and complete copy of my entire medical file/records be copied and produced, to the attorney identified in Section 2, which authorization includes but is not limited to:

- Any and all records pertaining to office visits and appointments;
- Inpatient or outpatient medical record tests and reports;
- Radiology records and reports;
- Cytology records and reports;
- Hospital records and reports;
- Billing statements and invoices;
- Autopsy records and reports;
- Consulting physicians' reports and records;
- Laboratory/clinic records and reports;
- Surgical procedure records and reports;
- Records and notes regarding personal histories, medical histories, social histories, family histories;
- Records and notes regarding alcohol and drug usage;
- Records and notes regarding psychotherapy/psychiatric records and notes;
- HIV records and reports;
- Physician orders;
- Nurses' notes;
- Progress notes;
- Medication notes and prescriptions;
- Correspondence;
- Reprints/radiographic copies of actual x-ray film;
- Reprints/radiographic copies of actual medical scans;
- Reprints/radiographic copies of all radiographic films and/or data;
- Actual pathology materials, including but not limited to slides, tissue blocks, recuts and stains; and
- Any or all other documents and writings whether they be regarding medical and/or non-medical services.

2. I authorize that the above documents be forwarded to Jessica L. Lentini, Esquire, Traub Lieberman Straus & Shrewsberry LLP, 322 Highway 35 South, Red Bank, New Jersey 07701.

3. I further authorize you to provide Jessica L. Lentini, Esquire, Traub Lieberman Straus & Shrewsberry LLP at the address listed in Section 2, a periodic update of any and all materials referenced above and pertaining to any and all subsequent care and treatment provided to me, as requested.

4. This authorization is valid for all requests made to you until the termination of the above referenced civil lawsuit pursuant to 45 C.F.R. Part 164.508(c)(iiv).

5. I hereby waive all privileges with respect to production of the above-referenced documents.

6. I direct that you are hereby released from any liability in connection with the disclosure of documents provided pursuant to this authorization.

7. I authorize that a copy of this authorization will suffice in lieu of the original.

8. I understand that I have a right to revoke the authorization at any time by notifying your office staff in writing. I am, however, aware that my revocation is not effective to the extent that the persons I have authorized to use and/or disclose my protected health information have acted in reliance upon this authorization.

9. I understand that if my protected health information is disclosed to someone who is not required to comply with the Federal Privacy Rule, then such information may be re-disclosed by the recipient and would no longer be protected.

10. I understand that you may not condition my treatment, payment, enrollment in a health plan, or eligibility for benefits upon the provision of this authorization. 45 C.F.R. Part 164.508(b)(4).

11. I understand that I have a right to refuse to sign this authorization.

12. I understand that I may see and copy the information described on this form if I ask for it and that I will receive a copy of this authorization after I sign it.

Witness

Patient Signature

Patient Name Printed

Date

OR

Witness

Personal Representative

Name of Personal Representative

Relationship of Personal Representative to Patient

Date

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendants: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

PROOF OF ATTORNEY MAILING

1. I, the undersigned, am Jessica L. Lentini, attorney(s) for Kyle L. Raikes, in the above-entitled action.

2. On October 8, 2021, I eFiled via eCourts the ANSWER, SEPARATE DEFENSES, CROSS-CLAIMS, ANSWERS TO ALL CROSS-CLAIMS, DEMAND FOR DAMAGES, JURY DEMAND, DESIGNATION OF TRIAL COUNSEL, NOTICE PURSUANT TO RULES 1:5-1 AND 4:17-4(c), DEMAND FOR INTERROGATORIES, DEMAND FOR EXECUTED HIPAA MEDICAL AUTHORIZATIONS AND CERTIFICATION and forwarded via U.S. Postal Service a courtesy copy to Brent Bramnick, Esq. at said addressee's last known address.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 8, 2021



TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP
Jessica L. Lentini
Attorneys for Defendant: Kyle L. Raikes

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-004864-21

Case Caption: BYRD KEICHA VS RAIKES KYLE

Case Initiation Date: 08/16/2021

Attorney Name: JESSICA LAUREN LENTINI

Firm Name: TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP

Address: 322 HIGHWAY 35

RED BANK NJ 07701

Phone: 7329851000

Name of Party: DEFENDANT : RAIKES, KYLE, L

Name of Defendant's Primary Insurance Company
(if known): Canal Insurance

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Answer

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: KEICHA BYRD? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/08/2021
Dated

/s/ JESSICA LAUREN LENTINI
Signed

EXHIBIT D

TRAUB LIEBERMAN

322 Highway 35 | 3rd Floor | Red Bank, NJ 07701

MAIN (732) 985-1000 | FAX (732) 985-2000

October 7, 2021

Brent Bramnick, Esq.
Bramnick, Rodriguez, Grabas, Arnold & Mangan, LLC
1827 East Second Street
Scotch Plains, New Jersey 07076

Via Email bbramnick@jonbramnick.com and Regular Mail

Re: Keicha Byrd v. Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, John Does 1-10 (said names being fictitious) and XYZ Corporations 1-10 (said names being fictitious)
Date of Loss: February 17, 2021
Docket No.: MID-L-4864-21
Our File No.: 0454.0020
Handling Attorneys: Lisa M. Rolle and Jessica L. Lentini

Dear Mr. Bramnick:

We represent Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, in the above referenced matter.

Please provide proof of service on my client, The Felix Group d/b/a KWJW Distributors, LLC. Additionally, enclosed please find a Request for Statement of Damages addressed to plaintiff, Keicha Byrd. Please provide plaintiff's response in the next five (5) days, pursuant to *New Jersey Court Rule 4:5-2*.

Thank you for your attention in this regard.

Very truly yours,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP



Jessica L. Lentini
jlentini@tlsslaw.com

JLL/am
Encl.

Jessica L. Lentini, Esq. 193012017

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

322 Highway 35 South

Red Bank, New Jersey 07701

732-985-1000

Attorneys for Defendants: Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC

TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

**REQUEST FOR STATEMENT
OF DAMAGES**

Pursuant to *New Jersey Court Rule 4:5-2*, defendants, Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, hereby demand of plaintiff, Keicha Byrd, a specific statement of the amount of money damages claimed on each count of the Complaint, within five (5) days of the date hereof.

Dated: October 7, 2021



Jessica L. Lentini, Esq.

TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP

Attorneys for Defendants: Kyle L. Raikes
and The Felix Group d/b/a KWJW
Distributors, LLC

EXHIBIT E

TRAUB LIEBERMAN

322 Highway 35 | 3rd Floor | Red Bank, NJ 07701

MAIN (732) 985-1000 | FAX (732) 985-2000

SECOND REQUEST

October 21, 2021

Brent Bramnick, Esq.
Bramnick, Rodriguez, Grabas, Arnold & Mangan, LLC
1827 East Second Street
Scotch Plains, New Jersey 07076

Via Email bbramnick@jonbramnick.com and Regular Mail

Re: Keicha Byrd v. Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, John Does 1-10 (said names being fictitious) and XYZ Corporations 1-10 (said names being fictitious)
Date of Loss: February 17, 2021
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Our File No.: 0454.0020
Handling Attorneys: Lisa M. Rolle and Jessica L. Lentini

Dear Mr. Bramnick:

We represent Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, in the above referenced matter.

Enclosed please find a Request for Statement of Damages addressed to plaintiff, Keicha Byrd. Please provide plaintiff's response in the next five (5) days, pursuant to *New Jersey Court Rule* 4:5-2.

Thank you for your attention in this regard.

Very truly yours,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP



Jessica L. Lentini
jlentini@tlsslaw.com

JLL/am
Encl.

Jessica L. Lentini, Esq. 193012017

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

322 Highway 35 South

Red Bank, New Jersey 07701

732-985-1000

Attorneys for Defendants: Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC

TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

**REQUEST FOR STATEMENT
OF DAMAGES**

Pursuant to *New Jersey Court Rule 4:5-2*, defendants, Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, hereby demand of plaintiff, Keicha Byrd, a specific statement of the amount of money damages claimed on each count of the Complaint, within five (5) days of the date hereof.

Dated: October 21, 2021



Jessica L. Lentini, Esq.

TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP

Attorneys for Defendants: Kyle L. Raikes
and The Felix Group d/b/a KWJW
Distributors, LLC

EXHIBIT F

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendant: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KJWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

**NOTICE OF MOTION TO COMPEL
PLAINTIFF TO PROVIDE A
RESPONSE TO DEFENDANT, KYLE L.
RAIKES', REQUEST FOR
STATEMENT OF DAMAGES**

To: Brent Bramnick, Esq.
Bramnick, Rodriguez, Grabas, Arnold & Mangan, LLC
1827 East Second Street
Scotch Plains, New Jersey 07076

PLEASE TAKE NOTICE that on **Friday, November 19, 2021, at 9:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned, attorney for defendant, Kyle L. Raikes, shall apply to the Superior Court of New Jersey, Law Division, Middlesex County, for an Order compelling plaintiff to provide a response to defendant's Request for Statement of Damages.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Order is annexed hereto, pursuant to *New Jersey Court Rule 1:6-2(a)*, and the within motion shall be deemed uncontested unless responsive papers are timely filed and served, stating with particularity the basis of the opposition to the relief sought.

PLEASE TAKE FURTHER NOTICE that the undersigned certifies all counsel of record will be served with the within motion and its supporting papers in compliance with *New Jersey Court Rule 1:5*, et seq.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, the undersigned shall rely upon the Certification of Counsel submitted herewith.

Oral argument is not requested unless opposition is filed.

The discovery end date is August 4, 2022.

Neither an arbitration nor a trial have been scheduled.

**TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP**



By: _____

Jessica L. Lentini, Esq.

Attorney for Defendant: Kyle L. Raikes

Dated: October 27, 2021

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendant: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

ORDER

THIS MATTER having been submitted to the Court by Jessica L. Lentini, Esq., Traub Lieberman Straus & Shrewsberry LLP, attorney for defendant, Kyle L. Raikes, on motion for an Order, compelling plaintiff to provide a response to defendant's Request for Statement of Damages, and the Court having considered the parties' arguments, and for good cause shown;

IT IS on this _____ day of _____ 2021:

ORDERED that defendant's Motion to Compel plaintiff's response to defendant's Request for Statement of Damages is hereby granted; and it is further

ORDERED that plaintiff is hereby compelled to provide a response to defendant's Request for Statement of Damages within five (5) days of the date of this Order; and it is further

ORDERED that a copy of the within Order shall be served upon all parties via eCourts.

J.S.C.

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendant: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

CERTIFICATION OF COUNSEL

I, Jessica L. Lentini, Esq., hereby certify as follows:

1. I am an attorney at law in the State of New Jersey and an associate with the law firm of TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP, counsel for defendant, Kyle L. Raikes, in the above-captioned matter.
2. As such, I am fully familiar with the facts set forth herein based upon my representation and review of the file.
3. I make this Certification in support of defendant, Kyle L. Raikes', Motion to Compel plaintiff to provide a response to defendant's Request for Statement of Damages.
4. This matter arises out of an alleged motor vehicle accident that occurred on or about February 17, 2021.

5. On October 7, 2021, defendant served plaintiff with a Request for Statement of Damages, pursuant to *New Jersey Court Rule 4:5-2*. A complete and true copy of defendant's October 7, 2021 request is attached as Exhibit A.

6. Defendant filed an Answer to plaintiff's Complaint on or about October 8, 2021, which also included a Request for Statement of Damages.

7. Plaintiff did not respond to defendant's requests and, on October 21, 2021, defendant served plaintiff with a second Request for Statement of Damages. A complete and true copy of defendant's October 21, 2021 request is attached as Exhibit B.

8. *New Jersey Court Rule 4:5-2* requires plaintiff to respond to defendant's Request for Statement of Damages within five (5) days.

9. Despite repeated requests, plaintiff has not provided a response to defendant's Request for Statement of Damages, and plaintiff's response is now overdue.

10. Accordingly, defendant respectfully requests an order compelling plaintiff to provide a response to defendant's Request for Statement of Damages.

I certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

**TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP**



By:

Jessica L. Lentini, Esq.
Attorney for Defendant: Kyle L. Raikes

Dated: October 27, 2021

Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendant: Kyle L. Raikes
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

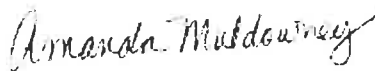
DOCKET NO.: MID-L-4864-21

Civil Action

PROOF OF MAILING

I, the undersigned, am a legal assistant with the law firm of Traub Lieberman Straus & Shrewsberry LLP, and I hereby certify that on October 27, 2021, I eFiled via eCourts defendant, Kyle L. Raikes', Notice of Motion, Certification of Counsel and Proposed Order in support of the instant Motion to Compel, and forwarded via U.S. Postal Service a courtesy copy to Judge J. Randall Corman, J.S.C., and to all counsel of record.

I certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



AMANDA MULDOWNNEY

EXHIBIT A

TRAUB LIEBERMAN

322 Highway 35 | 3rd Floor | Red Bank, NJ 07701
MAIN (732) 985-1000 | FAX (732) 985-2000

October 7, 2021

Brent Bramnick, Esq.
Bramnick, Rodriguez, Grabas, Arnold & Mangan, LLC
1827 East Second Street
Scotch Plains, New Jersey 07076

Via Email bbramnick@jonbramnick.com and Regular Mail

Re: Keicha Byrd v. Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, John Does 1-10 (said names being fictitious) and XYZ Corporations 1-10 (said names being fictitious)
Date of Loss: February 17, 2021
Docket No.: MID-L-4864-21
Our File No.: 0454.0020
Handling Attorneys: Lisa M. Rolle and Jessica L. Lentini

Dear Mr. Bramnick:

We represent Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, in the above referenced matter.

Please provide proof of service on my client, The Felix Group d/b/a KWJW Distributors, LLC. Additionally, enclosed please find a Request for Statement of Damages addressed to plaintiff, Keicha Byrd. Please provide plaintiff's response in the next five (5) days, pursuant to *New Jersey Court Rule 4:5-2*.

Thank you for your attention in this regard.

Very truly yours,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP



Jessica L. Lentini
jlentini@tlsslaw.com

JLL/am
Encl.

NEW YORK
NEW JERSEY
ILLINOIS
FLORIDA
CONNECTICUT
CALIFORNIA

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Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendants: Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

**REQUEST FOR STATEMENT
OF DAMAGES**

Pursuant to *New Jersey Court Rule 4:5-2*, defendants, Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, hereby demand of plaintiff, Keicha Byrd, a specific statement of the amount of money damages claimed on each count of the Complaint, within five (5) days of the date hereof.

Dated: October 7, 2021



Jessica L. Lentini, Esq.
TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP
Attorneys for Defendants: Kyle L. Raikes
and The Felix Group d/b/a KWJW
Distributors, LLC

EXHIBIT B

TRAUB LIEBERMAN

322 Highway 35 | 3rd Floor | Red Bank, NJ 07701
MAIN (732) 985-1000 | FAX (732) 985-2000

SECOND REQUEST

October 21, 2021

Brent Bramnick, Esq.
Bramnick, Rodriguez, Grabas, Arnold & Mangan, LLC
1827 East Second Street
Scotch Plains, New Jersey 07076

Via Email bbramnick@jonbramnick.com and Regular Mail

Re: Keicha Byrd v. Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, John
Does 1-10 (said names being fictitious) and XYZ Corporations 1-10 (said names being
fictitious)
Date of Loss: February 17, 2021
Docket No.: MID-L-4864-21
Our File No.: 0454.0020
Handling Attorneys: Lisa M. Rolle and Jessica L. Lentini

Dear Mr. Bramnick:

We represent Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC, in the above
referenced matter.

Enclosed please find a Request for Statement of Damages addressed to plaintiff, Keicha Byrd.
Please provide plaintiff's response in the next five (5) days, pursuant to *New Jersey Court Rule*
4:5-2.

Thank you for your attention in this regard.

Very truly yours,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP



Jessica L. Lentini
jlentini@tlsslaw.com

JLL/am
Encl.

NEW YORK
NEW JERSEY
ILLINOIS
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CALIFORNIA

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Jessica L. Lentini, Esq. 193012017
TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP
322 Highway 35 South
Red Bank, New Jersey 07701
732-985-1000
Attorneys for Defendants: Kyle L. Raikes and The Felix Group d/b/a KWJW Distributors, LLC
TLSS File No.: 0454.0020

KEICHA BYRD,

Plaintiff,

v.

KYLE L. RAIKES, and THE FELIX GROUP
d/b/a KWJW DISTRIBUTORS, LLC, JOHN
DOES 1-10 (said names being fictitious) and
XYZ CORPORATIONS 1-10 (said names
being fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-4864-21

Civil Action

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OF DAMAGES**

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Dated: October 21, 2021



Jessica L. Lentini, Esq.
TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP
Attorneys for Defendants: Kyle L. Raikes
and The Felix Group d/b/a KWJW
Distributors, LLC

EXHIBIT G

BRENT A. BRAMNICK, ESQ., ID # 027412008
BRAMNICK, RODRIGUEZ,
GRABAS ARNOLD & MANGAN, LLC
1827 East Second Street
Scotch Plains, NJ 07076
Telephone: (908) 322-7000
Facsimile: (908) 322-6997
Attorney for Plaintiff

KEICHA BYRD,

Plaintiff(s),

v.

KYLE L. RAIKES, and THE FELIX
GROUP d/b/a KWJW DISTRIBUTORS,
LLC , JOHN DOES 1-10 (said names
being fictitious) and XYZ
CORPORATIONS 1-10 (said names
being fictitious),

Defendant(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
DOCKET NO.: MID-L-1127-21

Civil Action

**RESPONSE TO REQUEST FOR
STATEMENT OF DAMAGES**

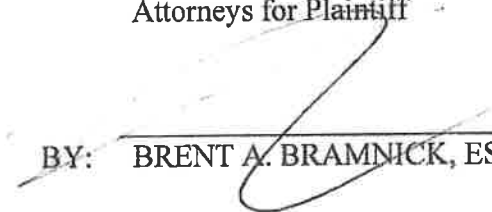
TO: Jessica L. Lentini, Esq.
TRAUB LIEBERMAN
322 Highway 35, 3rd Floor
Red Bank, NJ 07701
Counsel for Defendant
KYLE L. RAIKES

Plaintiff, hereby responds to the Demand for a Statement of Damages from the
Defendant, Kyle Raikes.

Plaintiff demands damages in the amount of \$1,000,000.00.

Dated: November 3, 2021

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff

BY:  BRENT A. BRAMNICK, ESQ.